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1   Q.   A programmer?

2   A.   That's how I would equate it.

3   Q.   Did Mr. Millan ever work as a

4   computer systems analyst?

5   A.   I have no idea.

6   Q.   Under you, did he ever work in

7   the lab as a computer systems analyst?

8   A.   Not in that term I wouldn't use

9   it, no.

10   Q.   Did he ever do any computer

11   programming when he reported to you?

12   A.   If we considered creating

13   databases and spreadsheet files to keep track

14   of the inventory and the elevation drawings

15   and the connectivity database, yes, I would

16   consider that.

17   Q.   Did he actually create the

18   database, or did he enter information into an

19   already existing database?

20   A.   As far as I know, he built the

21   database.

22   Q.   What kind of a database was it?

23   A.   Just an Excel database. He

24   laid out the field structure, he figured

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1   out -- he put in the fields that were

2   required, and then he put in all the data

3   related to all the equipment.

4   Q.   So was it an Excel document or

5   something more complicated than that?

6   A.   For the most part, it's an

7   Excel document with some links.

8   Q.   So it's not like an Access

9   database?

10   A.   It's not Access, it's Excel.

11   Q.   But it's a document as opposed

12   to a database?

13   A.   We use the terms

14   interchangeably with Excel and Access. You

15   can do some key stuff with Excel now with all

16   the tables and the pivots and the feature

17   functionality that they've built into it.

18   Q.   You said there were some links?

19   A.   Yeah. They -- you know,

20   Carmelo and Naseer were able to figure out

21   ways to embed text into the Word doc where you

22   click on a Word doc or click on the Excel file

23   or click on the elevation diagram, and it

24   would show you the pertinent information

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1   related to that equipment.

2   Q.   So, like, a link to another

3   document?

4   A.   Yup.

5   Q.   Do you consider that to be

6   computer programming?

7   A.   It is if you don't know how to

8   do it. Right? Not being coy. Yes, I would

9   consider it -- I mean, some of it is -- you

10   know, I can't do it.

11   Q.   Did he work for you as a

12   software engineer?

13   A.   No.

14   Q.   When he worked for you, did his

15   job involve the application of systems analyst

16   techniques, analysis techniques?

17   A.   Yeah.

18   Q.   What specifically?

19   A.   Analyzing a request that came

20   in, making sure the capacity in the

21   environment within the lab could support it,

22   making sure that what the engineers think they

23   want done is really going to work from a

24   network infrastructure and connectivity point

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1   of view.

2   Q.   Nothing beyond what you already

3   testified to earlier. Correct?

4   A.   Correct.

5   Q.   And was he involved in

6   designing computer systems?

7   A.   I would consider the whole

8   build-out or design of the lab and all its

9   interconnectivity a system, its topology and

10 assembly. You've got to make sure all the

11 piece parts work together seemlessly in order

12 for it to work.

13   Q.   So the build-out of the Warren

14 facility you would consider falling into the

15 category of design of computer systems?

16   A.   I would.

17   MS. WALSH: I don't have any

18   other questions.

19   MS. BOUCHARD: I don't have any

20   questions.

21   - - -

22   (Witness excused.)

23   - - -

24   (Deposition concluded at 3:52

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1   p.m.)

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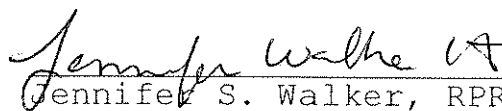
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1   C E R T I F I C A T E

2   I hereby certify that the

3   witness was duly sworn by me and that the

4   deposition is a true record of the testimony

5   given by the witness.

6

7

8   _____
      Jennifer S. Walker, RPR
9   Dated: February 21, 2008

10

11   (The foregoing certification of this

12   transcript does not apply to any reproduction

13   of the same by any means, unless under the

14   direct control and/or supervision of the

15   certifying shorthand reporter.)

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07011000 — Global Engineering Lab Manager/Coord...

Status	**Filled**	Recruiter	**D. Morrissey**	Department	**Business Office**
Status Details	**Unposted**	Hiring Manager	**A. Discepolo**	Primary Location	**Warren**
Previous Status	**Open**				
Hired	**0 out of 1**	Offers	**1 accepted out of 1**		

Logistics

Identification

Requisition Number
> 07011000

Justification
> **Replacement**

Number of Openings
> 1

Title
> **Global Engineering Lab Manager/Coordinator**

Title (by Manager)
> **Global Engineering Lab Manager/Coordinator**

Structure

Owners

User Group
> **NAM**

Recruiter (ID and Name)
> **0002029766—Daniel J Morrissey**

Hiring Manager (ID and Name)
> **0002601725—Amedeo R Discepolo**

Recruiter Assistant (ID and Name)
> **Not Specified**

Hiring Manager Assistant (ID and Name)
> **Not Specified**

Collaborators

Name	Email Address	Title
No frequent collaborators have been defined.		

Job

Function **Technology**

Department (Number and Name)
> **CB00028946 - Business Office**

Organization

Level 1 **Citigroup - CTGHR**

Level 2 **CORPORATE CENTER - CORPORATE**

Level 3 **CORPORATE OPS & TECHNOLOGY - CB00003921**

Level 4 **Chief Information Office - CB00035504**

Level 5 **Citigroup Arch and Tech Eng - CB00200030**

Level 6 **Voice and Data Networks - CB00200249**

Level 7 **Not Specified**
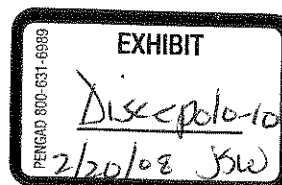
Level 8 **Not Applicable**

Level 9 **Not Applicable**

Level 10 **Not Applicable**

Level 11 **Not Applicable**

Level 12 **Not Applicable**

Level 13 **Not Applicable**

EXHIBIT
Discepolo-10
2/20/08 JSW
PENGAD 800-631-6989

Level 14 **Not Applicable**

Level 15 **Not Applicable**

Level 16 **Not Applicable**

Level 17 **Not Applicable**

Level 18 **Not Applicable**

Level 19 **Not Applicable**

Level 20 **Not Applicable**

Primary Location

World Region   **North America**

Country   **United States**

Region/State/Province **New Jersey**

County/City   **Warren**

Template Used (Code and Job Title)

CB6586—Manager

Profile

Employee Status   Schedule

Regular   **Full-time**

Shift

Day Job

Education Level

Associate's Degree

Travel

No

Target Start Date (mm/dd/yyyy)

Not Specified

Citi Fields

Account/Expense Code (not used for APAC and EMEA)   Local Dept ID   Relocation

CB0000007737   **CB00028946-COMMN Business Office**   **No**

Business Area

42500 Citi Operations & Technology — Citi Information and Technology Services   Grade

                                                                                     T

Approval Routing Information   Budget Information

Not Specified   **Not Applicable**

Justification Reason/Additional Information

Carmelo Millan has resigned from Citigroup effective 3/14/07. This req is required to hire a replacement FTE for him. When Carmelo leaves the firm, this will leave only 1 FTE (junior) to support almost 300 engineers across the CATE Organization product development efforts as they relate to the Warren Lab. This person will act as the focal point to provide day to day oversight for lab activities.

BAU responsibilities include the following:
-Receiving, tracking and return shipping of all CTI GE evaluation equipment
-Space Allocation and planning Equipment Installs — Because of the on-going evaluations in the Lab, on average there about 15 installs per week, in some instances as high as 40 per week
-Infrastructure requirements, cabinets, power, cable plant infrastructure
-Patching and configuration of all lab equipment
-Device configuration and IP address assignment
-Managing the build of test topologies
-Maintaining lab inventory / Completion of annual Insurance Questionnaire
-Procurement of core lab infrastructure equipment for Lab (e.g. term servers, test equipment, diagnostic

equipment)
-Maintenance of patching / cabling databases
-Troubleshooting and resolution of connectivity / configuration problems in test topologies

Location Code	Office Location / Address
CBNJ28041 283 KING GEORGE ROAD	283 King George Road, Warren NJ

Brief Description of the Organization

Cate Networks is responsible for product development and standards that can be implemented globally in a consistenet manner. As such the Warren Lab is key component in the organization as approx. 300 engineers utilize this lab on a dialy basis to develop and certify products for deployment.